

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:

Toll Free Access Codes

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) CC Docket No. 95-155
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Comments of the United States Telephone Association

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Summary

The NPRM correctly concludes that numbers in toll free access codes are a valuable public resource, and that it would be helpful to establish policies to promote the efficient use of toll free numbers, and to guard against warehousing without interfering with the industry's established processes for reserving and distributing such numbers. USTA recommends that the Commission accomplish these goals by promoting an environment in which numbers are perceived to be in adequate supply and by creating incentives to utilize numbers efficiently. One example of such an incentive would be to establish a relatively low monthly charge for each assigned 800 number.

The NPRM also expresses concerns regarding the relationship between "vanity" numbers in different toll free service access codes, e.g., that a user of such a vanity number would commit fraud against the user of the related number in another code. Such fraud should be addressed directly; the Commission should not establish a "right of first refusal" or other property right in telephone numbers. Such a measure would be contrary to a sound policy precedent that users have no property rights in numbers, and contribute to a "gold rush" mentality regarding the 888 code. Such a measure could also encourage confusion where subscribers might otherwise correctly identify that numbers in different codes are different. Additionally, to the extent that vanity numbers create an identifiable mnemonic, those mnemonic identifiers (although not the numbers themselves) are protected by copyright and trademark law.

The Commission should also impose only the minimum number of requirements on the practice of number assignment and reservation. Any restrictions imposed should be limited to direct sanctions for improper behavior wherever possible. For example, the Commission's proposals to regulate number assignments between competitors by utilizing industrial classifications is unnecessary, and will impose unneeded and complex burdens on both the Commission and the industry.

The Commission should recognize that some time will be needed to convert network switches to support new toll free codes. While the Commission should not impose any particular network design solution, e.g. equipping all tandem switches to process all toll free codes, it should direct industry groups to continue developing an implementation plan for the next toll free code beyond 888. USTA attaches a report prepared by Database Service Management, Inc. (DSMI) which indicates the number of codes in actual service, and levels of assignment activity. This information should be a useful part of the process of determining an appropriate timetable for implementing the 877 code.

The Commission should also bear in mind that implementation of the 888 code involves significant levels of costs, time and effort. Consequently, the industry should be assured that it has at least 18 months after implementation of 888 to make the decisions necessary to develop and implement a plan to process future codes. The Commission can assist in creating this assurance by taking responsive action if any infractions of established procedures for number assignment are discovered.

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Comments of the United States Telephone Association

The United States Telephone Association (USTA) submits these comments in response to the Notice of Proposed Rulemaking issued in the above-referenced proceeding.¹ USTA is the principal trade association of the local exchange carrier (LEC) industry. USTA represents over 1100 LECs, with a wide variety of company sizes within its membership.

I. The Commission Should Focus On Assisting In the Establishment of an Environment in Which Numbers Are Perceived As In Adequate Supply and Create Incentives to Utilize Numbers Efficiently

The NPRM correctly notes that numbers in the toll free service access codes comprise a finite and valuable public resource. NPRM, para. 1. It is not disputed that the network must be configured in such a manner that makes assignment and use of new codes a much more straightforward proposition. However, network resources will always be scarce commodities because of the cost and time to plan for and implement usage of new codes. For these reasons, the best way to counter the perceived need to hoard and use codes in unproductive ways is to create an environment in which 1) numbers are accurately seen by users as being in adequate supply, and 2) efficient use of numbers is rewarded and inefficient use is counterproductive.

¹Toll Free Access Codes, Notice of Proposed Rulemaking, CC Docket No. 95-155, (released October 5, 1995) ("NPRM").

A. The Commission Should Encourage the Development of An Environment In Which Numbers are Accurately Seen by Users As Being in Adequate Supply

Human nature being what it is, the natural approach to a resource that is necessary and scarce is to lay in a supply of the scarce item so that there is assurance that essential activities can continue without interruption. USTA believes that if both reality and its perception are that numbers are not in short supply, then the motivation and practice of stockpiling numbers will be reduced considerably.

Network upgrades are underway that will allow use of the new 888 NPA for toll free dialing service. One of the best ways that the Commission can reduce the perception of shortage is to assist the industry in protecting the useful life of the 888 code while the necessary upgrades to accommodate the next code(s) are underway. As will be expanded upon later, an essential ingredient to this condition is refusing to sanction the establishment of presumed rights or relationships between numbers in different code groups, e.g. 800 and 888. Commission sanction of such relationships could continue the perception of scarcity and the associated "gold rush" mentality regarding toll free numbers. Also, minimal government regulation will advance the perception that numbers are in adequate supply. Complex regulations and elaborate conditions regulating number assignment will increase the perception that an adequate supply of numbers may not be available when needed and the motivation to stockpile will continue.

This situation is illustrated by some of the complex suggestions for controlling the use of numbers such as assignment based on industrial classification, NPRM, para. 44, and the circuit breaker model. NPRM, paras. 51-54. As explained below, these suggestions are unworkable and represent unnecessary additional burdens. Affirmative Commission action to reduce the perception of scarcity associated with numbers will be the best way to reduce the motivations to hoard numbers.

B. The Commission Should Promote an Environment in Which Efficient Use of Codes Is Advantageous to the User, And Inefficient Use is Counterproductive

In the case of numbers, service providers have some significant economic disincentives to stockpile or warehouse numbers that they are not using. Keeping track of unused or inactive numbers creates administrative burdens, and there are periodic charges for storing records of assigned numbers in the SMS. The fewer numbers needed to establish a given level of activity will yield more economical operations. On this basis, a service provider would only want to ensure that sufficient numbers were available to respond in reasonable time to customer requests. These efficiency incentives, where not counteracted by concerns regarding scarcity, encourage all users to use numbers efficiently.

We believe that it is essential that requirements that have been established in the industry forum process be recognized as determinant of the appropriate use of toll free numbers. We also believe that the Commission must have the information and motivation to act against use that is inconsistent with established conditions for appropriate use of numbers. The conditions should be established in this proceeding. However, the Commission should limit its involvement to the necessary minimum. As essential as the Commission's involvement is in promoting an environment which minimizes stockpiling of numbers, additional federal regulatory control is the most complex and burdensome of any of the options.

Plainly, some of the suggestions made in the NPRM should not be adopted. For example, the proposal to regulate assignment of 888 analogues to existing 800 vanity numbers based on industrial classification, NPRM, para. 44, would involve the Commission in complex decisions concerning the proper industrial classification and examination of corporate arrangements to protect against shams and evasive behavior. It would be far more effective for the Commission to simply police fraud directly. Similarly, the circuit breaker model, NPRM, paras. 51-54, would require the creation of significant administrative procedures and apparatus, involve the Commission in sensitive numbering allocation decisions, and could increase the perception of scarcity associated with new toll free codes. As the Commission notes, other

conservation proposals may render circuit breaker rules unnecessary. NPRM, para. 55.

One simple measure that might merit consideration would be to establish a relatively low monthly charge for each assigned toll free number. Such a charge might be established at a level that would not inhibit use of numbers for legitimate purposes, but would be high enough that stockpiling numbers for extended periods could become burdensome. Such a levy would not replace industry agreed-to standards for assignment, but would operate in concert with them. This would also increase the motivation to adopt measures such as the Commission has suggested, e.g., the use of PIN numbers with toll free numbers. NPRM, para. 20.

Importantly, these motivations would operate without any other enforcement rules or action. Service providers would be permitted to balance the benefit of lower charges (for one number) compared to charges for 10,000 numbers (if the PIN were four digits) with the need for customer entry of PINs. We believe that the Commission should thoroughly examine suggestions of this type before imposing complex regulatory measures, particularly those that include punitive remedies. Moreover, the Commission should evaluate and adopt measures that to the greatest degree possible tend to reward activities that are beneficial to the industry as a whole, and resort to detailed regulatory procedures and punitive actions only when they have been demonstrated to be necessary.

II. The Commission Should Not Establish or Sanction Any Presumed Relationships Between Different Ten-Digit Numbers, Including a Right of First Refusal for 888 Number Assignments.

The NPRM requests comment in a number of areas related to the relationship between existing numbers in the 800 code, particularly “vanity” numbers, and numbers in the 888 and other codes. See, e.g., NPRM, paras. 35-48. The Commission should recognize that any specific action to establish rights or presumptions with respect to such a relationship could have serious negative implications on the future use of numbers for the following reasons: 1) it would contradict recognized law and policy decisions that there are no property rights

associated with a particular telephone number, 2) establishing presumed relationships could condition the public to disregard or be inattentive to essential differences between numbers, 3) such action would hasten the exhaust of the new resource as well as future codes assigned to the same service, and 4) in any event, cases of interference or anti-competitive behavior can be resolved when identified and verified.

A. The Commission Should Not Establish Any User “Rights” Associated with Particular Telephone Numbers.

The record identifies concerns on the part of some large users that they have a financial interest in their existing 800 numbers, particularly “vanity” numbers utilized for marketing purposes. These users are apparently concerned that unless they can reserve specific numbers with easily recognizable mnemonic identities in the new code to match their assignments in the old code, customer confusion may result.² Presumably, these users are fundamentally concerned that competitors might obtain those numbers and utilize them in a fraudulent manner. NPRM, para. 35, n.75.

Such fraudulent behavior is a conceivable occurrence. However, to the extent that remedies to this concern are premised upon a right of first refusal, or other “right” associated with a particular telephone number, such remedies would be in conflict with existing precedent which establishes that telephone numbers are a public resource. See NPRM, para. 36.

Second, it is impossible to know ahead of time which numbers might be used in a manner that either of the assignees might consider to be in conflict. Many numbers that are heavily used have no mnemonic meaning at all, e.g. Northwest Airlines utilizes 1-800-225-2525. Some numbers may have available multiple mnemonics or other obscure meanings to

²The Commission should disregard these concerns to the extent that concerns regarding “customer confusion” are premised on a desire to preclude honest and fair competition from other providers.

some users and assignees. The result is that it is impossible to know ahead of actual experience which numbers might exhibit relationships, if any such relationships would actually be manifested, and the length of time that any relationship would require protection. Establishment of a set of fair and consistent definitional requirements around related numbers would be virtually impossible.

For example, would a new 800 assignment automatically reserve the equivalent 888 number if the assignee claimed a "relationship?" Also, would it be possible that a new 888 assignment might entitle the 888 assignee to "backwards reserve" the equivalent code in 800? Could a customer cause a search to be conducted to find "pairs" of numbers that are unassigned in order to get "two for the price of one?" The inability to determine what relationships might exist, which ones might be devised or discovered in the future, and the difficulty in developing rules and procedures to control them all suggest that the Commission should not at this time establish any rights, principles or guidelines governing the assignment of analogue numbers.

B. Establishing A Presumed Relationship Could Actually Create Customer Confusion Which Would Otherwise Not Exist

Considering the fact that customers will benefit from educational initiatives undertaken by both carriers and the Commission, it would be premature to assume that customers will be confused by two entirely different ten-digit phone numbers. In fact, if the Commission were to sanction presumed relationships between different ten-digit numbers in different NPAs, callers may become careless about the meaning of the NPA when dialing. If such relationships were to be established between some numbers in the 800 and 888 NPAs, customers might come to expect that similar relationships exist between all numbers in the two codes.³

³It is also possible that setting a precedent with respect to "ownership" of a telephone number would lead customers to confuse a relationship established here with relationships between numbers in other NPAs. A customer could move to another area code and anticipate that the same seven digit number could be (or

C. A Right of First Refusal Could Exacerbate Exhaustion of the 888 Code

Preassignment or a right of first refusal of 888 analogues to existing 800 number users would also contribute to the "gold rush" mentality, and could prematurely exhaust the 888 code. The effect of a right of first refusal will be to exacerbate issues related to code exhaust in the entire North American Numbering Plan, and in particular, could negate planned relief measures for toll free dialing codes.

The record in this proceeding will show again that implementation of relief codes is costly and requires time for planning and implementation and imposes significant new costs on network operators. USTA's members are committed to implement network upgrades to process new traffic. They are also committed to implement features in the network that will permit future expansions to be less time consuming and costly. As it now stands, however, many network elements cannot be upgraded quickly to process traffic using new codes, and many of those upgrades are costly. In many cases, end office switches cannot be upgraded to handle new codes, except to pass traffic dialed with those codes on to other network nodes (most usually tandem switches) to process the new traffic. Even without the need to protect specific numbers, demand for numbers in the 888 code can be expected to be brisk. No one can state with any degree of certainty just how strong legitimate demand will be for numbers in the new code. Actions which would exacerbate the demand for 888 numbers and impose additional costs related to the associated network upgrades would be contrary to the public interest.

D. Cases of Interference or Anti-Competitive Conduct Can Be Resolved As They Are Identified and Verified

The Commission has pointed out some possible situations in which anti-competitive conduct could occur because of a presumed relationship between different toll free calling

should be) assigned. Customers may also become confused in the case of other special codes, such as 500 codes. Users may expect that if the 500 code exhausts, and the next NPA is assigned, that claims of relationships would also be honored there.

numbers. But rather than attempt to develop plans for coping with situations that are unlikely to occur in the first instance, USTA recommends that the Commission establish conditions whereby situations that do occur may be expeditiously resolved.

There exist in the industry today many processes and procedures that telecommunications service providers utilize to satisfy customers' needs. These processes should be relied on to resolve most issues that may arise here, as well. Additionally, to the extent that the concern is that the number would be advertised and utilized in its mnemonic form by the competitor - this could be prevented by invoking copyright law.⁴ It could also be made a part of the rules that if such an occurrence was confirmed by the Commission, the number could be taken back and held for an extended period of time before it was again available for reassignment. There are remedies to ensure against intentional misuse, and they should be made a part of the operating rules attendant to use of the resource.

For these reasons, USTA urges the FCC to make a clear determination that each ten digit number is unique with no inherent presumed relationship with any other ten digit number. Dealing with confirmed interferences as they are demonstrated is the most efficient method of addressing this issue. The Commission should recognize the immediate disadvantages and long term negative implications of establishing any officially sanctioned relationships between different ten digit numbers, particularly a right of first refusal for new assignments in the 888 code. Instead, the Commission should declare its intent to rely on efforts in the industry to minimize such occurrences and work cooperatively to resolve expeditiously issues that arise that cannot be resolved in a cooperative framework.

⁴Although a telephone number cannot be protected by a copyright, tradenames, corporate names and other mnemonics are subject to copyright protection. See, NPRM, para. 39.

III. USTA Urges the Commission to Minimize to the Greatest Extent Possible Any Restrictions On the Process of Making Toll Free Numbers Available.

The Commission makes a number of proposals to limit the rate at which numbers can be used, and the time during which numbers can be reused. See, e.g., NPRM, paras. 22-25. Some broad principles are appropriate to consider when analyzing these proposals. For instance, in a competitive marketplace, the absolute minimum number of requirements should be imposed on the factors that govern the service. The Commission is to be commended for establishing the limits that have been applied to the assignment level of 800 resources. Laudable as this activity may be, it must be kept in context - these are exceptional measures taken in what must be characterized an extreme emergency. The Commission proposes to impose many additional detailed requirements on the practice of number assignment on a continuing basis, e.g., a permanent cap on reserved numbers. NPRM, para. 33. Such proposals are contrary to the spirit of business in a competitive environment. Any restrictions that are imposed should be limited to those imperative for the orderly conduct of business.

As an example, there are certain practical limitations to the number of transactions that can be handled in a given time period in downloading the service control points (SCPs) from the Service Management System (SMS). RespOrgs may be limited in the number of records that can be entered in the SMS in a given time period. It is clearly appropriate for the Commission to discover such limitations and sanction limits to the number of transactions that can be made in a given time period in order to prevent saturation of the system. The Commission should avoid imposing additional details in any requirements concerning assignment and use of new codes.

An example is the proposal to impose limits on the time that a number can be held in reserved status. The record developed in this proceeding should be determinate of whether the Commission should inject itself into such details - unless there are compelling reasons for the Commission to do so, USTA generally recommends that the Commission abstain from involving itself in these details. As part of any determination on these issues, many of these

issues have been addressed by consensus forums in the industry. In some cases, the conditions attendant to times in reservation (as well as others) have been addressed, and the conclusion reached was that shortening times involved could have significant competitive implications, and the effect on exhaust of the resource would be minimal. The Commission should make maximum possible use of the results of careful industry consideration on these issues. Direct involvement by the Commission in these issues may not have any significant beneficial effect.

IV. The Commission Should Recognize that Significant Time May be Required to Convert Network Switches to Support All Toll Free Codes

The NPRM concludes that all network switches in the United States should have, at a minimum, the software needed to support all toll free codes reserved by the industry in January 1995⁵ installed by February 1997. NPRM, para. 20. The issues raised by this proposal are more complex than might be apparent. At the present time, information available to USTA indicates that there are about 20,600 end office switches in the network and about 3,500 tandems. Of these, approximately 1,800 end offices are electromechanical - switches that will never be able to process new toll free codes (and do not process 800 codes today). Their only action is to route traffic upward in the network to another switch (usually a tandem) where the necessary intelligence functions must be accomplished. Plans for replacement of these electromechanical switches vary considerably from one telephone company to another, given individual circumstances. Intelligent network features are expensive to deploy, and it is very likely that traffic carried through these switches will continue to be routed through tandem switches for processing.

⁵ At the January, 1995 INC meeting, relief codes beginning with 888 inclusive and in sequence through 822 were reserved for toll free calling service. This action was formally resolved on 3/3/95. See record of Issue #036 in the record of the proceedings of the NPA Assignment Guidelines Workshop of the Industry Numbering Committee. USTA considers that this group of codes is included in the Commission's meaning in the statement "...all toll free codes reserved by the industry in January 1995....".

There are also approximately 1,700 electronic stored program control switches in the network that cannot support intelligent network functions. In many cases, the manufacturers do not support intelligent network functionalities in these switches at all. Ironically, some of these switches are more difficult to manage than older electromechanical switches, since their limited intelligence identifies many new codes or routings as invalid. In addition, there are about 650 older digital switches that cannot support advanced intelligent network functionalities. In some cases, the earlier generations of switches are not supported, in others, relatively new switches with many advanced capabilities do not support intelligent capabilities.

In many cases, the only method by which some independent telephone companies can have their originating toll free calls screened for proper routing is to forward that traffic to a tandem switch owned by another entity. In such cases, the independent telephone company is dependent on the owner of the tandem for processing its toll free calls. These entities must have the freedom to develop capabilities in order to process originating traffic in the most economical and effective manner. This may not include equipping the tandem to route traffic dialed using all of the reserved codes. In some such cases, the tandem owner could incur significant costs to equip switches to screen all of the reserved codes.

Accordingly, the Commission should recognize that planning for introduction of new or expanded services that require specialized treatment for traffic originating on such switches will require time to implement. While the owners of such switches have a fine record of managing to process and route traffic as required, often employing inventive solutions, these switch operators must have sufficient time to plan for introduction of new capabilities.

The Commission notes that routing calls using new codes through a tandem rather than an end office is both inefficient and unnecessarily costly to the interconnecting carriers that have circuits carrying all their 800 calls from LEC end offices, stating “we see no reason to allow the routing of new codes to be done any differently than the routing of previous codes”

NPRM, para. 30.

The Commission's proposal would not be reasonable under these circumstances - in some cases tandem routing for screening will be the only option available.

V. The Commission Should Direct Industry Groups to Continue Developing An Implementation Plan for the Next Toll Free Code Beyond 888

Identification of a trigger that would begin implementation of the next code is a worthy goal. It would be desirable to reach a condition in the network so that when any new code is implemented, the ability to implement the next code on six months' notice would be a part of the implementation. With the introduction of the 888 code, the exchange network may be close to the capability of screening 877 numbers as well. It will take time, however, to discover all of the pertinent facts attendant to implementation of 877 and the succeeding codes that have been identified.

USTA recommends that this issue be referred to the Industry Carriers Compatibility Forum (ICCF) which is part of the Alliance for Telecommunications Industry Solutions (ATIS) consensus forum structure. ICCF should be assigned the responsibility to track use of toll free codes, establish appropriate planning guidelines, and to assemble a plan for implementation of the 877 and future toll free dialing codes. The Commission should establish a twelve month deadline for ICCF to complete this process.

In order to do meaningful planning, the industry needs continuous and current statistics on the number of codes in actual service and levels of assignment activity. Attachment A is a copy of a report prepared by Database Service Management, Inc (DSMI) dated October 11, 1995. This report was distributed at a recent FCC public meeting on the matter of implementation of the 888 code.

USTA recommends that DSMI be requested to prepare reports such as this on a monthly basis and distribute them to the industry. These reports could be used as a basis for planning activities in order to forecast the remaining life of toll free numbering resources.

VI. The Commission Should Establish Conditions to Ensure That the Numbering Resources in the 888 Code Last for 18 Months.

In order for this process to work, USTA believes it is essential that the Commission agree to assign to the Common Carrier Bureau the task of working in cooperation with the industry to monitor usage of numbers in the 888 NPA, and, if necessary, take action to ensure that the numbering resources in the 888 code will last long enough so that introduction of the 877 code may occur in an orderly manner. We believe that if the Commission takes action on the issues as suggested herein it will greatly reduce the requirement for further extraordinary Commission intervention.

Contrary to the belief of some, implementation of the 888 code is a major challenge - until that is accomplished, there will be few resources in the industry to concentrate on planning for implementation of future codes. In the case of smaller operating areas, the decisions that must be made to accommodate these new codes are of enormous significance. If a company is planning to retire an old technology switch, besides all of the other considerations, a decision must be made on when and if to go to AIN. The timing of the change will depend on when AIN will be available, how much it costs, and how much stranded investment will exist in the old switch. Companies that have older technology switches may not be able to afford switch replacement and the cost of AIN and may be forced to rely on others to screen their traffic for indefinite periods, depending on the capabilities of tandems.

For these reasons, the industry should be assured that it has 18 months after implementation of 888 to make the decisions necessary to develop and implement a plan to process future codes. If ICCF completes the process within 12 months of implementation of

888, and the 888 code lasts for an additional 6 months, the industry will have had time to prepare for implementation of the next code, taking into consideration the eventual need to implement additional codes.

RespOrgs have a unique role in the provision of toll free service; collectively they are keepers of all customer records. USTA recommends that RespOrgs be required to provide periodic summary reports to the Chief of the Common Carrier Bureau on assignment and usage of toll free numbers, as well as forecasts of number usage. The Bureau could use this information as a basis for any investigations that might be deemed necessary, and aggregate the usage forecasts for release as additional planning information.

CONCLUSION

The Commission encourage an environment which promotes the reality and the perception that numbers are in adequate supply, and fosters the existing incentives for the efficient use of toll free numbers. The Commission should support the number usage reports provided by DSMI as a valid reference for use by the industry as a planning document and affirm that it will rely on industry forums to the maximum extent possible to develop limits, procedures and conditions for assignment and usage of numbers, developing mandatory requirements only when demonstrably necessary. If the Commission establishes permanent transaction and code assignment limits, they should be based solely on the maximum handling capacity of the network support systems.

The Commission should also decline to establish any "rights" in existing 800 numbers, or sanction any presumed relationships between different 10 digit numbers. The Commission should monitor consumption results of the level of 888 assignments and be prepared to take action as necessary to ensure that the 888 resource has sufficient life to permit the orderly implementation of 877 and succeeding toll free dialing codes. Finally, the Commission should


direct the ICCF to develop a comprehensive industry wide plan⁶ for relief to the ICCF.

As a general matter, USTA commends the Commission for taking the difficult actions necessary to extend the life of the 800 resource. Notwithstanding the need for these actions, the Commission should adhere to a long term policy of minimizing its intervention in numbering allocation decisions, relying as much as possible on the resources within the industry to ensure that traffic processing needs are met. USTA's suggestions are made in order to assist the Commission in achieving long term goals which are in its interest, those of the industry and the unfettered operation of a free marketplace.

Respectfully submitted,

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⁶ By "comprehensive industry wide," we mean that the plan must address implementation of all of the reserved codes, identify critical "break points" and establish realistic estimates of actions that must be taken. This process must include recognition that factors are continuously changing - the plan must be regularly revisited to verify its relevance.

800 Number Resource Utilization

Most Recent Weekly Data

Date	9/24/95	10/1/95	10/8/95
Working 800 Numbers	6,484,708	6,503,018	6,526,059
Assigned 800 Numbers	32,794	33,019	33,428
Reserved 800 Numbers	60,689	60,857	53,517
Disconnect 800 Numbers	327,515	322,434	316,727
Transitional 800 Numbers	18,905	19,367	19,555
Unavailable 800 Numbers	529	514	505
Suspend 800 Numbers	1,141	1,024	927
Total:	6,926,281	6,940,233	6,950,718

800 Number Resource Utilization

Latest Exhaust Projection

- Quantity of 800 Numbers Available for Use.....7,710,000
- Quantity of 800 Numbers in Use (on 10/8/95).....6,950,718
- Quantity of 800 Numbers Still Available in SMS/800.....759,282
- Weekly Usage (based on 6/21/95 FCC Order).....29,000
- Estimated Time to Exhaust.....26 Weeks (4/6/96)

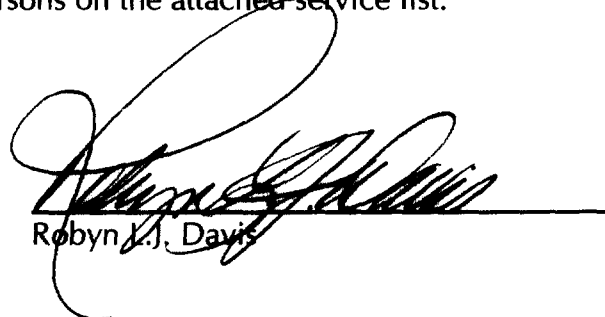
800 Number Resource Utilization

The quantity of allocated resources used in recent weeks:

Week ending September 23, 1995	27,630
Week ending September 30, 1995	28,169
Week ending October 7, 1995	23,172

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on November 1, 1995 copies of the Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



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